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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20054

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Telephone Number Portability) CC Docket No. 95-116
) RM 8535

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**U S WEST PARTIAL OPPOSITION TO
GTE'S MOTION TO EXTEND THE COMMENT DATE**

U S WEST opposes GTE's request to extend the comment date by 30 days, from September 12 to October 12, 1995.¹ U S WEST instead recommends that the comment date remain September 12, but that the reply date be extended to November 13, 1995. This schedule would allow GTE to file its customer survey on October 12, as its requests, and give the rest of the industry the opportunity to comment on this study in the reply comments.

The Commission initiated this proceeding on July 13, 1995. The Commission gave the industry 60 days in which to prepare comments — until September 12 — and 30 days in which to prepare reply comments — until October 12. U S WEST is prepared to submit comments on September 12 and, it suspects, the rest of the industry is similarly prepared as well.

GTE now proposes that the comment date be extended another 30 days. This extension is appropriate, GTE says, because it is in the process of conducting a customer survey regarding telephone number portability which will not be completed until October 12. GTE notes (correctly) that, if the current comment schedule is maintained, the industry will not have the opportunity to comment on this GTE study unless industry members file supplemental comments.

¹ See Request of GTE for Extension of Time in which to File Opening Comments, filed August 31, 1995.

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U S WEST agrees with GTE that there is “very little empirical data regarding the potential demand for LNP” and that its survey “can only assist the Commission in making the important determinations it is called upon to make in this proceeding.” GTE Motion at 2 and 3. U S WEST also agrees that the industry should be given the opportunity to analyze and submit public comment on GTE’s study results.

The answer to GTE’s dilemma, however, is not to extend the comment period and delay the commencement of this critically important proceeding. The Commission gave the industry ample time to prepare comments, and the industry is ready to timely file comments on Tuesday.

The answer to GTE’s dilemma is rather to extend the reply comment date by 30 days giving the industry 60 days to review the comments and prepare reply comments. Under this proposal, GTE could still file its customer survey on October 12, giving the industry 30 days to analyze and comment on the study.

Equally important, it is doubtful whether the industry will be able to prepare thorough and insightful reply comments under the current schedule (whereby only 30 days have been allotted to reply comment preparation). The comments filed will almost certainly be voluminous — both in number and in size — and the subject matter is extraordinarily complex. In these circumstances, 30 days may not be ample time to prepare reply comments.

Extending the reply comment date now will meet GTE’s needs without delaying the commencement of this proceeding. Taking such action now will also give the industry some breathing room to analyze the comments filed. And such action will obviate the need for members of the industry to seek an extension of the reply date at a later time.

For the foregoing reasons, U S WEST respectfully requests that the Commission maintain the current comment due date of September 12, 1995. but that it extend the reply comment date to November 13, 1995. This schedule will give the entire industry more time to review and analyze what will undoubtedly be voluminous comments and, if GTE submits its study on October 12, will give the industry the opportunity to comment on the study in their reply comments.

Respectfully submitted,

U S WEST, Inc.

By: 

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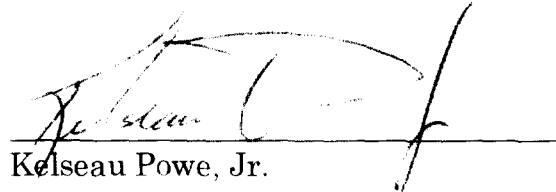
303-672-2700

Dan Poole, Of Counsel

September 6, 1995

CERTIFICATE OF SERVICE

I, Kelseau Powe, Jr., do hereby certify that on this 6th day of September, 1995, I have caused a copy of the foregoing **U S WEST PARTIAL OPPOSITION TO GTE'S MOTION TO EXTEND THE COMMENT DATE**, to be served via first-class United States Mail, postage prepaid, upon the persons listed on the attached service list.



Kelseau Powe, Jr.

***Via Hand-Delivery**

(CC95116.COS/JB/lh)

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